

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

KIMIESHA HILL, et al., on behalf of)	
themselves and all others similarly situated,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 5:21-cv-00097-SLP
)	
TOWN OF VALLEY BROOK, et al.,)	
)	
Defendants.)	
)	

UNOPPOSED MOTION TO EXTEND CASE DEADLINES

Plaintiffs Kimiesha Hill, Jason Garnett, and Kiara McCorkle, by and through their undersigned counsel, hereby move this Court to extend all deadlines set forth in the current Scheduling Order (ECF No. 40) by 90 days. This is Plaintiffs' first request to extend case deadlines. In support of this request, Plaintiffs aver as follows:

1. Pursuant to this Court's Order at ECF No. 40, the current case deadlines are as follows:

Event	Deadline
Class certification motion, including all supporting exhibits and reports to be filed by	December 2, 2022
Opposition to class certification motion, including all supporting exhibits and reports to be filed by	January 16, 2023
Reply in support of class certification filed by	January 23, 2023

2. The Parties initially sought an ambitious class certification schedule in this case during the Case Management Conference on June 9, 2022. The Parties

also agreed to defer setting additional case deadlines, including dispositive motion deadlines and a trial date, until the Court rules on class certification. As Plaintiffs noted during the Case Management Conference, they believed the deadlines were appropriate for the matter, and anticipated that discovery would proceed quickly enough to comply with the deadlines.

3. Shortly after the Case Management Conference on June 23, 2022, Plaintiffs served each Defendant with a First Set of Requests for Production of Documents (“RFPs”). Despite Plaintiffs’ agreements to give Defendants several extensions, and three meet-and-confer conferences between the Parties, Defendants have only recently made limited, partial document productions.
4. Many of the requested documents have yet to be produced, including without limitation: contemporaneous notes from municipal hearings for potential class members; documents that Defendants indicated they would not produce until the Court entered a Protective Order;¹ and other responsive documents requested in the RFPs necessary for class certification. Plaintiffs also have identified approximately ten witnesses that they expect to depose once productions are complete in connection with their class certification motion. These productions and depositions cannot be completed within the current

¹ Plaintiffs circulated a proposed protective order on August 25, 2022. On September 22, 2022, Defendants consented to the proposed order, which Plaintiffs filed that same day. This Court entered the Protective Order on September 26, 2022. ECF No. 42.

class certification timeframe, despite Plaintiffs' best efforts to proceed expeditiously with fact and class discovery in this case.

5. These productions and depositions are necessary and important to the completion of discovery and Plaintiffs' anticipated Motion for Class Certification.²
6. An extension will not affect any other deadlines in this case beyond class certification.
7. Plaintiffs have notified Defendants of this Motion to Extend Case Deadlines and been advised that Defendants do not oppose this Motion.
8. As a result, Plaintiffs now respectfully request a 90-day extension of the case deadlines, as follows:

Event	Proposed Deadline
Class certification motion, including all supporting exhibits and reports to be filed by	March 2, 2023
Opposition to class certification motion, including all supporting exhibits and reports to be filed by	April 17, 2023
Reply in support of class certification filed by	April 24, 2023

9. A proposed Order is attached as Exhibit A.

Respectfully submitted September 30, 2022.

² On September 29, 2022, Plaintiffs delivered a Deficiency Letter to Defendants outlining the deficiencies related to Defendants' amended responses to Plaintiffs' RFPs.

s/Jonathan M. Irwin
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CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2022, I electronically submitted the attached document to the Clerk of Court using the ECF System. Based on the records currently on file, the Clerk of the Court will transmit a Notice of Electronic Filing to the ECF registrants on file.

s/Jonathan M. Irwin